

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

UNITED STATES OF AMERICA,
)
)
v.
)
)
VARIAN LEFEBVRE,
)
Defendant.
)

Case No. 2:21-cr-00006-1

**UNOPPOSED MOTION TO CONTINUE DATE FOR TRIAL
AND FOR EXCLUSION OF TIME**

On January 4, 2022, this Court held a pre-trial conference at which it set the jury draw date for February 8, 2022, and the trial for the week of February 28, 2022. Following the pre-trial conference, undersigned counsel consulted with Mr. Lefebvre regarding these dates. Undersigned counsel will be retiring from the Federal Defender Office on February 11, 2022, and his replacement will be starting in the office on January 31, 2022. Mr. Lefebvre is now in agreement that in order for new counsel to have sufficient time to become familiar with his case and prepare for trial, a continuance of the trial date until late March or April is needed. The government has stated that it does not object to this motion.

WHEREFORE, Mr. Lefebvre respectfully requests that the dates for jury selection and trial in this matter be continued until late March or April, 2022, in order to allow for counsel to adequately prepare for trial. Mr. Lefebvre agrees that the time between the filing of this motion and the jury trial (provided it takes place before the end of April, 2022) be excluded from the Speedy Trial Act calculation pursuant to 18 U.S.C. § 3161(h)(7)(A). This continuance is necessary in order to allow for adequate preparation for trial. The ends of justice served by such delay outweigh the best interests of the public and the defendant in a speedy trial.

Dated: January 5, 2022

By: /s/ David L. McColgin
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